

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

ROBERT DAVID STEELE)

et al)

Plaintiffs,)

v.)

Case 3:17-cv-601-MHL

JASON GOODMAN)

et al)

Defendants.)

PLAINTIFFS' MOTION *IN LIMINE*

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to § 28 of the Court’s Initial Pretrial Order [*ECF No. 157*], respectfully move the Court (a) to prohibit defendant Jason Goodman (“Goodman”) from calling as a witness at trial any person who Goodman failed to disclose pursuant to Rule 26(a)(1)(A)(i) (mandatory disclosure of persons likely to have discoverable information that the disclosing party may use to support his defenses), (b) to prohibit Goodman from using at trial any document that Goodman failed to produce pursuant to Rule 26(a)(1)(A)(ii) (mandatory production of copies of documents that the disclosing party may use to support his defenses), and (c) to prohibit Goodman from using at trial any document that Goodman failed to produce in response to Plaintiffs’ discovery requests.

The reasons and bases of this Motion are stated more fully in the accompanying Memorandum. A proposed Order is attached as *Exhibit “A”*.

CONCLUSION AND REQUEST FOR RELIEF

For the reasons stated above, Plaintiffs respectfully request the Court to grant their Motion *in Limine* and preclude Goodman from calling undisclosed witnesses and using documents that he failed and/or refused to produce.

DATED: January 17, 2020

ROBERT DAVID STEELE
EARTH INTELLIGENCE NETWORK

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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke.

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